

UNITED STATES DISTRICT COURT

For the
Northern District of Ohio
Civil Division

FILED

AUG - 1 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
AKRON

<p>Cary V. Hendy Plaintiff</p> <p>VS</p> <p>Stephanie Bostos Demers, ...Et al. Defendants</p> <p>See attached list</p>	<p>CASE NO: 5:24 CV 1321</p> <p>Judge JUDGE CALABRESE</p> <p>MAG JUDGE GRIMES</p> <p>Initial Filing</p>
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Complaint for a 1983 Action

<p>Stephanie Demers et al.</p> <p><i>State agents under color of law</i> <i>(see next pages attached)</i></p>	<p>Cary V Hendy</p> <p>Pro Se 2757 Progress Park Stow OH 44224 Chendy@ameritech.net</p>
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Receipt # 9639 8-1-2024 DAB

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Introduction to Filing

In 2001 a former Ohio AG prosecutor, **G. Michael Payton**, was hired to become the ‘Executive Director’ of the Ohio Civil Rights Commission, hereafter **OCRC** or commission.

The OCRC was written as Ohio’s governing neutral arbiter of a CIVIL law. As such this commission was granted the extraordinary power to self promulgate law statutes:

O.R.C. 4112.04 Commission - powers and duties (A) The commission shall do all of the following:

(4) Adopt, promulgate, amend, and rescind rules to effectuate the provisions of this chapter and the policies and practice of the commission in connection with this chapter;

(5) Formulate policies to effectuate the purposes of this chapter and make recommendations to agencies and officers of the state or political subdivisions to effectuate the policies;

Right there this commission, state agent of one CIVIL law, was granted the power to change its own set of rules which oversee all citizens. **Commissioners come to work** an average of 16 days a year, for about 4 hours; in regular job time comparison that’s **approximately 8 full days a year**. Can you imagine what a former prosecutor, having carte blanche leadership with no scrutiny, would do when directing this CIVIL law government agency written as neutral?

If a state prosecutor running a civil law agency wasn’t kerosene enough, toss in overzealous ambition to pleasing a federal agency which has been paying this Ohio Commission \$3million annually, that’s coercion. Now think about how neutral that former prosecutor’s directives to all aspects you can’t yet be aware of are...

...that’s the ‘iceberg tip’ in briefest summary of what’s herein.

Preface

(My written statement under oath)

Whatever springes the state may set for those who are endeavoring to assert rights that the state confers, the assertion of federal rights, when plainly & reasonably made, is not to be defeated under the name of local practice.

-Davis v. Wechsler, 263 U.S. 22, 24 (1923) (Holmes, J.)

I, Cary Hendy, when having been forced upon the legal path of O.R.C.4112, **then did become aware** to fact that **state agents for this Ohio law were denying my rights, statutory & constitutional**. From mailed accusation levied to eventual receipt of an “*auto-guilt*” letter, labeled ‘*probable cause*’, I couldn’t miss the fact that I’d had NO proper & lawful interactions mandated of state agents; the DUE PROCESS & EQUAL PROTECTION which was written in this Ohio CIVIL law was intentionally & criminally obstructed. To that, I made repeated effort to inquiries of when those mandated by law would talk with me, or my witnesses. **No one ever did so**, despite being my civil rights, due process, & equal protections afforded me by the U.S. Constitution. (*Readers will be shown each level by statute mandate I “urged objection” for my rights*)

During my self defense to what became one long administrative proceeding taking years, **I personally experienced** all legal travels to & on each step of this one Ohio law, **O.R.C4112**; I tell you plainly, the path of Ohio’s civil law O.R.C.4112 is mired of corruption & politics.

It’s ironic that an Ohio commission written to defend rights, did self promulgate new statutes being written with specific purpose to intentionally deny Ohio citizen’s from their rights.

Many top Ohio political players, lawyers, legislators & judges, are involved so abscond.

@Ex1, you find Ohio’s Supreme Court denies jurisdiction.

@Ex2, Please read the filed "Memorandum of Jurisdiction" to Ohio's high court.

(This Ohio Supreme Court filing's referenced attachments are kept as then written. First Series A having #'s A1-A25. Series B has pgs b1-b7 which are read while referring to a previous court's filing which was then attachment 5, so to keep all unaltered & have in B series, a 'B' was placed before the prior court's filed document using 5 as the attachment, so now "B5 Series" having pgs 1,9,10,11 is the referred material in plain B; simply Series B is read which refers to the pages in B5 series. Series C are also previous other entirely different court's filings so the series is C yet each document has original letter from where it was previously filed in alphanumeric as standard.) Sorry its actually simple once read.

If I may, a very relevant theme has taken me some time to understand its common recurrence & significance. That being this... at every step in my Ohio case's legal action, *on the path of O.R.C.4112 Ohio Civil Rights Commission, hereafter as OCRC or the commission*, I realized that all *actors on that Ohio law's path automatically knee jerk to political interest's bias or racial bias*. While civil rights as a topic may be politically fraught, I'll be presenting two Ohio agency's procedures (& their unlawful partnering) & then *the actions of named Ohio agents* when being federally coerced by the U.S Department of Housing & Urban Development, HUD. To this, I simply & politely request of your full & undivided attention when reading the material & applicable referenced documents which I've placed before you; everything detailed herein will clearly stand out for itself.

Are you aware of what HUD has designated as "*Substantial Equivalency*" certification? It's the pressure, *actually its coercion, which federal agency HUD applies to state's agencies* by informing them that HUD will withdraw their state agency's eligibility for HUD federal funds & grant monies if that state agency doesn't comply with HUD's certification dictates. *EVERYONE can understand that losing significant monies coming in would be a huge pressure & stress filled*

threat in need of dire action. It's simple really, a state administrative agency possibly losing federal funding, *in '91 that was a potential \$700,000 loss for the OCRC,* had placed **intense pressure on an Ohio agency's mgmt.** How do think an Ohio commission's executive director would & did behave to save their federal monies? Perhaps wiser would be to start considering what Ohio's agents wouldn't do to instead garner further federal favor. Emphasis added.

During my travels on R.C.4112, I've had to learn how Ohio agents are far overreaching & corrupting this Ohio law when acting for, & to further impress, a federal agency. That federal agency, being HUD, now pays the Ohio commission \$3million annually to a 'job sharing agreement' @exhibit3; do you know what state agents have done since 1991 to get a 400% raise for acting on behalf of HUD? Do you know how Ohio agents act under color of state law when federally coerced? I can plainly say that **I do know** both what they're mandated to do & what they're truly doing; you'll read to find documented detail to each 'named' Ohio agent's actions.

I'll be presenting you my experience with O.R.C.4112's agents. Of that, I believe much of what I've experienced on O.R.C.4112's path to be unconstitutional; over that time, I was continually learning of Ohio agencies & their state agents, mostly lawyers, where I eventually found that constitutional law backgrounds were the ties that bound Ohio political players reaching to higher aspirations for federal acknowledgement & appointments. What I share of rights being denied, **statutory** & **constitutional,** happens to 1000's of Ohioans per year due to overzealous agents for R.C.4112.

As I begin writing of my personal experience on that path of O.R.C. 4112, I proffer to you that **prosecutors,** former & current, federal & state, have been **systemically altering CIVIL**

law procedures into criminal law govt pursuits; they do so via lobbying new administrative laws by self promulgating powers. Why? Because prosecutors now *self generate legal actions* for accolades & assessed fees through the use of “Private Enforcement Initiatives” to a CIVIL law. It's far from proper; what's occurring is actually no holds barred entrapment.

To understand fact of prosecutor(s) self generating charges by using private citizens look @Ex4's @bottom left corner showing it's part of the OCRC's 2007's Annual Report, where @ the top text writes “Education & Outreach”. There @February's 4th diamond point, you read “Executive Staff” **Stephanie Demers... to discuss better ways of working together in GENERATING & investigating housing charges**”. Take NOTE of a clear & relevant matter... Ms Demers was not Executive Staff of the Ohio Commission as it's written; Ms Demers was an OHAG prosecutor in 2007 & '08. Think on that, a prosecutor was ‘Educating & Outreaching’ to private citizens on “Working together to generate & investigate housing charges”. Now you can know as fact, in '07 prosecutor Demers marketed to ‘generating’ housing charges for legal actions; that's exactly as the prior ¶ wrote of prosecutors systemically altering procedures. One can now also understand that prosecutors were self initiating CIVIL law housing charges... prosecutors have literally made a civil law into criminal law proceedings.

Please find Ex5 being a 2009 Cleveland State Law Review article having been written by **G Michael Payton**, Ohio Civil Rights Commission's written under his name, & Matthew Miko. (Miko was an EE@ OCRC under Payton) The article's title has written in it “...the Future of Fair Housing in Ohio...”, again that's from 2009. **Exhibit6** is pg8 from that Ex5 article, in the underlined text & first 3 arrows, you read an Ohio appellate court rules, in '09, “*there is no need for private enforcement under Ohio's Fair Housing Laws*”. So what was OHAG prosecutor Demers doing in 2007 coaching private enforcers @OCRC meeting? When reading Ex6's

middle w/3 arrows & 4 notes, you find **Demers & G Michael Payton**, Executive Director of the OCRC, *were already using 'Private Enforcers' to initiate legal actions* while such procedure wasn't lawful in Ohio in '07 or '09; So when did they start & possibly end?

Remember Payton's law review article Ex5 had wording "...**the FUTURE**..."? If we look further back, we find that *both Demers & Payton had been prosecutors @ OHAG's Civil Rights Section*, while in 2001 Payton became Executive Director of the OCRC, a separate & different Ohio agency. These former peer prosecutors, now employees of 2 separate Ohio agencies in 2001, had this duo then *start & implemented an unlawful "partnership Committee" which I've labeled as "Team Prosecution"*; it was Payton's & Demer's true & actual '*...Future of Fair Housing Enforcement...*' without any lawfulness to slow them down. @Ex7 is OCRC's 2004 Annual Summary where their *unlawful "Partnership Committee"* is detailed in existence. You read there *2 separate & distinct Ohio agencies, their agents, all prosecutors former & current, acting together to further their prosecutorial entrapment of Ohio citizens*. Statute O.R.C. 4112.052 writes of '*refer the matter to the attorney general for commencement of a civil action in a court of common pleas*', there's no language which the OHAG, being mandated counsel for the OCRC, has been written directives as that legal counsel to partner up with its client, the OCRC. Payton & Demer's "Partnership Committee" is beyond lawful directives written in any statute. These career prosecutors will be shown denying both constitutional & statutory rights from 1000's of Ohioans from '01 through '19. When Demers was let go from the OHAG's in '08, Payton eventually brought her to be his Chief Legal Counsel @ the OCRC in January 2014; I was attacked by their actions in August of 2014.

(Demer's documented criminal violations of me, while cc'ing Payton & OHAG 'partners', shown herein)

This preface's cursory introduction of this state agent duo was quick & clear documented fact of these state agents, former Prosecutors, acting under color of state law, who take actions like Ex4's 2007 class on...*'working together with "Private Enforcers" to GENERATE housing charges'*. Per Payton's own description in Ex5, center of the page circled, he writes of private enforcers *"...acting as Private attorneys general"*. I've clearly shown that Payton & Demers were working together, even at times calling it a 'partnership committee' & having classes to coach illegal private enforcers in Ohio; all of which was occurring since early 2000's.

Did you know that **"private enforcers"** are part of the **"Substantially Equivalent"** standard levied to state agencies by HUD? Did you know "Private Enforcers" are sponsored & receive grants from HUD to police Ohio citizens? I proffer HUD violates U.S. Constitutional constraints set @our country's inception by leveraging a state's ability to receive federal monies only when that state polices its own citizens by HUD's administrative *reinterpretations* of civil law. Payton & Demers, being 2 prosecutors, from 2 different Ohio agencies, took 'substantially equivalent' to criminal levels; their partnering 2 Ohio agencies acted well past legal & ethical.

Do you know anything about *'substantially equivalent' 'private attorneys general acting across the state'* of Ohio? Are you aware that Cleveland & Akron were the OCRC's *"testing ground for private attorney generals"* (due to 2 Ohio reps shown in Exhibit2) from 2003- 2015 prior to what became an Executive Order in fall 2015? That Order was rebuked, & then made again 2021; I was attacked in 2014. Here's my very personal experiences by attestation, please read Exhibit 8

Primary Synopsis to Claim(s)

This Ohio Civil Rights Commission, an administrative agency, does purposefully self promulgate statutes, delete process & procedures, & unlawfully “partners’ with a 2nd Ohio agency & privately held nonprofits to intentionally deny rights from 1000’s of Ohioans each year since the early 2000’s. It’s ironic that an agency written to protect rights was “Executive Director-ed” to purposefully & intentionally deny statutory & constitutional rights from 1000’s each year. (Most of which is being done by “agents acting under color of law” & those nonprofits are commission political & social relationships of pecuniary self enrichment) A SHAM LEGAL PROCESS has been built & criminally obstructed by lawyers, mostly former & current prosecutors, who personally benefit. (In Ohio sham legal process is a criminal violation of O.R.C.2921.52) Named Ohio agencies, by & through “agents acting under color of law” do commit violations of more than 7 Ohio Criminal Statutes.

Ohio’s judicial system tarnishes the legal profession when those performing judicial & appellate reviews did not only bias to the OCRC, they instantly prejudiced those accused. When I, the prejudiced defendant, had by O.R.C.4112.06(C) lawfully ‘urged objection’ to each Ohio judiciary encountered that- ‘Ohio’s agencies, by & through their state agents, have & repeatedly do commit criminal acts “under color of law”, each & every judge did blatantly “look away” from Ohio agents purposely committing violations of >6 Ohio criminal statutes to deny Ohioan’s their rights.

Myself, & 1000’s of other Ohioans annually, are being criminally violated by Ohio agencies & entities to be shown. State agents, being either elected, appointed or employed,

have built an administrative set of illegal & criminal procedures to '**entrapment**' for their **pecuniary enrichment , career advancement & political interests**. (*The majority of these individuals are attorneys, being state employees former & current, who understanding legal procedure, did purposefully build their own procedures to test constitutional boundaries while they simultaneously can obstruct their efforts due to being lawyers*) Some of the lawyer's self promulgation work will be shown then state agents will be shown by a walk down to the following order of criminal acts they commit:

Those described violate the following Ohio Criminal Codes:

- 1) Section 2921.45 | Interfering with civil rights
- 2) Section 2921.44 | Dereliction of duty
- 3) Section 2921.32 | Obstructing justice
- 4) Section 2923.01 | Conspiracy
- 5) Section 2923.13 | Falsification in an official proceeding
- 6) Section 2913.01 | Fraud
- 7) Section 2921.52 | Using sham legal process
- 8) Section 3.07 | Misconduct in office

Each of these crimes being committed by 2 state agencies, by & through state agent employess will be walked down as we go through pertinent sequence.

Jurisdictional Requirement(s)

The federal cause of action contained in 42 U.S.C. § 1983 permits persons whose federal rights are violated by defendants acting under color of state law to bring civil suits for both damages and injunctions. A 1983 action is the principal civil remedy for the private enforcement of the federal Constitution against state and local governments and their employees.

I. Show that I was deprived of property as a result of state procedure:

Please find @Exhibit9 ‘*OCRC Order pg3*’ & Exhibit10 “*Certificate of Judgment for Lien*”, # JL-20245329 dated 5/20/24. You notice that I was state commission ordered to pay, then had placed the county lien against me for the same total of \$24,400.50 +interest; clearly that’s my property denied. This awarded amount is direct evidence which can further substantively prove my allegation that the OCRC is corrupt when having its agents deny Ohio statutory & Federal Constitutional rights.

II. Show State Procedure Itself Violates Due Process Rights:**A) Proper Procedural Due Process- Ohioans first written rights along R.C.4112:**

The OCRC’s first MANDATED, its PRIMARY, duties @ R.C.4112.04(A)(6):

O.R.C 4112.04 Commission - powers and duties: (A) *The commission SHALL do all of the following:*

(6) Receive, investigate, and pass upon written charges made under oath of unlawful discriminatory practices;

Let’s read “**SHALL**” defined @ <https://www.law.cornell.edu/wex/shall> -

Shall is an imperative command, usually indicating that certain actions are mandatory, and not permissive

*This commission **is mandated** to receive (*receipt of accusation gains subject matter jurisdiction*), (then) **investigate (both civil law parties circumstances to accusation, evidence etc)**, & render upon written statements (*accusations*) made under oath... **this commission is legislatively written to be a NEUTRAL ARBITER between parties of its one CIVIL LAW, O.R.C. 4112;** it’s **not a criminal law**. This statute DOES NOT write lawfulness to be **partial, biased, or conflicted of interest**; the OCRC is mandated to be a NEUTRAL government agency of **CIVIL**

LAW that “SHALL INVESTIGATE written charges made under oath”... Let’s read ‘*how & why*’ criminal violations of accused’s rights to that “investigation”...

B) INTENTIONAL VIOLATION(s) of Procedural Due Process:

The OCRC provides self written public information evidence. This Ohio Commission has been granted the extraordinary power to self promulgate new rules. Here’s how the commission “*abuses the discretion*” ...by ridding its mandated duties to those accused.

****State agency crimes from hereon will now be shown as they occur...**

Section 2921.45 Interfering with civil rights (A)

No public servant, under color of the public servant's office, employment, or authority, shall knowingly deprive, or conspire or attempt to deprive any person of a constitutional or statutory right.

1) SELF PROMULGATED new rules which deny 5th & 14th amendment rights:

(NOTE- Prior to presenting Ohio’s self promulgated new rules, we must first remember this paper’s intro showed you that the federal agency, HUD, is financially coercing Ohio’s Civil Rights Commission to be ‘Substantially Equivalent’, hence 5th & 14 amendments are applicable to what that Ohio coerced commission does to match HUD’s directives)

The OCRC has ‘*Abused its Discretion*’ when using the extraordinary power to self promulgate new statutes. Here are those statute additions made into R.C.4112 (watch what happens to the “shall investigate”):

The first self made statute change...

4112.05... (B) (2) Upon receiving a charge, the commission may initiate a preliminary investigation

* a duty to investigate becomes “may initiate” & “preliminary”

Then the next commission made change...

4112.05... (B) (3)(a): Unless it is impracticable to do so, ...the commission shall complete a preliminary investigation.

* duty's now "**preliminary investigation**" unless even that's "**impractical to do**"

So you can readily guess even the preliminary investigation is **always** impracticable to do but the OCRC goes even further to simply just "**we're not gonna do an investigation**"

...and finally as the law manipulated to standing now...

4112.05... (B) (3)(b) ...the commission shall notify the complainant and the respondent in writing of the reasons for the noncompliance.

Those Purposefully written statute changes to 'not-investigate' are clearly *deliberate obstruction & denial of that statutory requirement & equally Ohioans Constitutional rights to Due Process & Equal Protection of the law*. You've now read **an accused's rights** to have what's levied at them be investigated to their facts & circumstances is gone.

Direct Evidence: How'd you like to be accused? My received "non-investigation" letter is @Exhibit 11.

Point: *These statutes are a very clear violation of R.C.2921.44. O.R.C.4112 is a CIVIL law; these statute additions are direct evidence of the commission's blatant disregard for written CIVIL law procedures. The OCRC is showing itself to NOT be a NEUTRAL & UNBIASED TRIBUNAL (being the #1 point of procedural due process on Judge Henry Friendly's list)*

Section 2921.44: Dereliction of duty:

No public servant, under color of the public servant's office, employment, or authority, shall knowingly deprive, or conspire or attempt to deprive any person of a constitutional or statutory right.

Direct Evidence: Find Exhibit 12 & 13 transcript record of witness(es) testifying they were never contacted by the OCRC's investigation (state agent violation by Defendant Brooks & others); consider a form letter by the commission writing it didn't investigate, as well as direct testimony under oath of that fact is solid *supporting detail* of the complaint.

2) OCRC writes annual summaries promoting its MISFEASANCE of accused:

Please find Exhibits 14, 15, & 16 which are being 3 pages from the OCRC's annual summaries; 14 is from 2003, 15 is from 2004, & 16 is from 2005.

Take a look at each of these pages in their exact numeric order, which is by years, '03-'05. You read on both the '03 & '04 summaries, being exhibits 14 & 15 that the OCRC's investigator will talk in detail with the party making the allegation. Then it further writes the investigator will contact those accused. We could argue difference of a detailed conversation vs contacting a party; I hope we can just agree that procedure is at least "kind of partial".

Now take a look at 16, which is from 2005's OCRC summary. You'll notice thereon that while the "charging party" is still talked with "in detail", now there is no longer contact made with those accused; they're no longer even mentioned in the summary at all. Those being accused have been left out of the now one sided investigation to make guilt. (sorry you've not yet seen all documents showing one sided bias to auto-guilt; you will soon though)

Point: O.R.C.4112 is a CIVIL law; these OCRC yearly summary pages, over just 3 years, is a critical point that will be further shown of why that timeframe. In once again blatantly clear text, readily to public knowledge, this Ohio commission yearly publicizes that those making accusation will be "talked with in detail" while over the same time period those being accused are having their rights literally deleted from yearly text material & of factual state

agents chosen deeds. You read the '04& '05's annual summaries pronouncing the agents no longer complete their duty to those accused, a clear violation of R.C.2921.45.

III. Show State Procedure's Criminal Origins Violating Rights:

A) Former Prosecutor, New Executive Director, Good Bye Rights:

Upon reading exhibit 17, in the prior '03 year's summary, you find 2 items noted. The first being where the state commission OCRC was "**Executive Director-ed**" *who made "a redesigned investigative process"*, by a former prosecutor, one **G.Michael Payton shown in Exhibit 18 who became the new director written there in July '01; Payton's redesign investigative process-->>> what you found in '04 & '05's summary showing state agents no longer want or do speak with those being accused.** Once again we've read clear criminal violation of at least those 2 criminal codes already shown. EX17's second note is the "hiring" of state agent Ms. **Diane Citrino**, were she's also shown in Exhibit 19 as an OCRC employee with her bio. *(Just take heed of Citrino we'll detail her after a few more exhibits on the path of state agent's criminal violations now showing to become violation of R.C.2921.52 Sham Legal process.)*

B) Where those Rights Disappeared to:

Please go to Exhibit 20, also being Ex7 yet we detail it here. Please take notice in the first ¶ you circled '**investigation/prosecutorial roles of the two offices**', obviously the former prosecutor who was under budgets cuts mentioned in Ex17 decided to reduce staff investigators & fill the void with another state agency's prosecutors as newly crowned "investigation/prosecutorial". Here's the large overreach by former prosecutors acting criminally, now find:

Section 4112.056 | Refer housing discrimination claim to attorney general

Whenever the Ohio civil rights commission has reasonable cause to believe that any person or persons are engaged in a pattern or practice of resistance to a person or persons' full enjoyment of the rights granted by division (H) of section 4112.02 of the Revised Code, or that any group of persons has been denied any of the rights granted by that division and the denial raises an issue of public importance, the commission may refer the matter to the attorney general for commencement of a civil action in a court of common pleas. The attorney general may seek any preventive relief considered necessary to ensure the full enjoyment of the rights granted by that division, including a permanent or temporary injunction or temporary restraining order.

This statute has the attorney general be legal counsel for any civil action which that Ohio Commission is a party to. (2 notes for reference #1 notice REFER to OHAG, also for commencement of a civil action; #2 text in 4112.056 DOES NOT WRITE the OHAG, being mandated counsel to the OCRC, is/can be a partner to OCRC) If you go back & read Exhibit6, you read where in '09 Payton writes of what he labels "Private Attorney Generals acting across the state". If you go back & read Exhibit 8 again you can revisit my personal experience of "*Private Attorney General's acting in Akron*". Anyway Exhibit 20 details the "UNLAWFUL Partnership Committee" doing pseudo prosecutor investigations which are exactly written as procedure in the flow chart of Exhibit 21.

Each of the actions to "a newly redesigned investigative process" violate the following Ohio Criminal Codes. State agents conspire to denying rights & that they conduct a lawful fair & proper CIVIL law investigation. They commit fraud, misconduct in roles & will falsify docs.

- 1) **Section 2923.01 | Conspiracy**
- 2) **Section 2923.13 | Falsification in an official proceeding**
- 3) **Section 3.07 | Misconduct in office**
- 4) **Section 2913.01 | Fraud**

Now you' ve been shown 2 Ohio agencies are "partnering" to a 'newly redesigned pseudo investigation' where no one inquires or talks to those accused; a civil law, R.C.4112, has been turned into criminal law procedure done by prosecutors as mgmt of 2 state agencies.

So let's see that directly being done to me ...

IV. Show State Procedure's Directly Violating My Rights:

I got the distinction of being personally criminally treated by a key player state agent in Ohio's criminal violations of its own citizens. Please find Exhibit22 being a published bio of **Stephanie Bostos Demers**; Demers directly violated my rights & even gave her arguments to why she felt she was lawful to do so when she email replied to me in 2016. You read I EX22 at the #2, she was previously with the OHAG Civil Rights Section, being 1997-2008 when scandal ended her time there, then @pt#1 shows Demers then becoming Chief Legal Counsel for the OCRC on Jan 13th, 2014. Demers was an OHAG prosecutor in 2001 through 08 being the years of the "*unlawful partnership*" & "*redesigned investigative process*". Then in 2014 went to work for Payton @ the OCRC as the other Ohio agency's now legal counsel; she rode both sides of the fence over years. (*I was attacked by 'Private attorney Generals' in August of 2014*)

@Exhibit 23 you find that email I just mentioned while it's header shows it was cc'd to also named defendants Lori Anthony, Michael Payton, & Keith McNeil; Ms Anthony is the Chief of the OHAG Civil Rights Section, after Demers, while Payton & McNeil were with the OCRC. You can see that clearly by their email address their name@ is each agency accordingly. Just know this is still the "partnership"

Exhibit 23, pt 1, shows all emailed. Pt#2 has Demers say there is an "investigation file" yet I requested that to the OCRC & told there was none. @pt #3, you read of my inquiring , then complaining, why the OCRC staff hadn't contacted myself or my witnesses. @pt #4, Demers tells me I did participate in the OCRC's investigation despite my inquiring why no one's contacted us. @ Pt#6 Demers admits the OCRC doesn't talk to my witnesses because they don't

have to. You've seen Ex 14-16 detailing no contacting those accused & Exhibit 11 Non compliance to investigate letter. (I blacked out the rest of that email to avoid distraction yet @ hearing it will be presented to her further criminal statements excusing why my rights are being denied, even more so by her right in the email.

@exhibit 24, pgs 1 &2, you read to find that Demers, former prosecutor on Team Prosecution @ the OHAG's, now @ the OCRC as Chief Legal Counsel, does personally over see & supervise the administrative law judge.

@Exhibit 25 you read an email from OHAG prosecutor Wayne Williams, former employee of Demers when she was @OHAG, who writes me with the OCRC's Final Order. He directly tells of that Order being prepared consistent with the directives of Stephanie Demers. Was that in her role of the OCRC, or of the OHAG directing that agency's prosecutors? Either way she was shown in every role being a key player to directly & personally denying my rights.

Ms Demers was a PRIMARY a founding member of Team Prosecution"; she repeatedly violated the rights of likely thousands of Ohioans attacked by 'Private Attorney Generals acting across the state"; She, as OHAG Section Chief, then OCRC counsel, did this right along with G. Michael Payton & the state agents they directed.

That's 2 Ohio agencies denying the rights of 1000's of citizens since around 2003's start of the 'Redesigned Investigative Process'.

V. Ohio corrective procedure nonexistent & the substantive wrong:

A) State correction intentional avoidance

When 2 Ohio agencies, by & through the acts of their agents, have been found or even alleged of acting inappropriately, who & how long do you think it takes for some

proper authority to conduct inquiry & investigation into those agencies? Let's leave alone stopping their actions. When a party in a legal action tells a judiciary of those agencies & state agents, being they're direct reports to the attorney general or the governor, are breaking criminal laws, do you think judges want to go on record to politically fraught material matters of those political players?

O.R.C.4112.03 Ohio's Civil Rights Commission, hereafter **OCRC** or the commission, is established by the following text:

Section 4112.03 | Ohio civil rights commission *There is hereby created the Ohio civil rights commission to consist of five members, not more than three of whom shall be of the same political party, to be **appointed by the governor**, with the advice and consent of the senate, one of whom shall be designated by the governor as chairman. At least one member shall be at least sixty years of age.*

That statute has the governor appoint "commissioners" who appear at that role 16x a year, where the time given averages 4 hours; that about 8 days a year for a \$58k yr salary. Do you think a "commissioner" knows what going on at the actual everyday commission workings? Here's another Ohio one to this exact similar point...

Section 4112.056 | Refer housing discrimination claim to attorney general

Whenever the Ohio civil rights commission has reasonable cause to believe that any person or persons are engaged in a pattern or practice of resistance to a person or persons' full enjoyment of the rights granted by division (H) of section 4112.02 of the Revised Code, or that any group of persons has been denied any of the rights granted by that division and the denial raises an issue of public importance, the commission may refer the matter to the attorney general for commencement of a civil action in a court of common pleas. The attorney general may seek any preventive relief considered necessary to ensure the full enjoyment of the rights granted by that division, including a permanent or temporary injunction or temporary restraining order.

This statute has the attorney general be legal counsel for any civil action which that Ohio Commission is a party to.

You were just presented 2 Ohio statutes in Ohio's Civil Rights Law, where Ohio's governor in 4112.03 for OCRC, & 4112.056 for the Ohio Attorney General in the other, have written statute mandated responsibility for personnel in 2 separate Ohio agencies. Might you consider that '*state agents acting under color of law*', being agents @ the OCRC & other agents @ the OHAG, could possibly act unlawful to their jobs? ... they can & do.

Do you think a governor & attorney general make it go away or go public about their state agent's actions?

Do you think state judiciary want to address either the governor or the OHAG about what you've just read? They didn't. I've told everyone player on this law, R.C.4112's path, that this was happening to me along.

You may read Exhibit 2 again to see the Ohio Supreme Court's denial to address what I showed them. That is & was Ohio's very poor corrective measure; they kicked the can to you. @series 'C' attachments to my OSC memorandum you find every place I lawfully by O.R.C. 4112.06(C) "Urged Objection" to; NO ONE even acknowledged a single thing other than portray my guilt.

VI. Show the Substantive Wrong:

@ Exhibit26 you will read the charge against me was '*dissuading a Caucasian tester*'. @ Exhibit 27 you read that caucasian's own testimony "**I was not dissuaded** when I was at the property".

Remember Demer's supervised both the administrative law judge, & her former prosecutor employee.

VII. Briefly Show Prosecutor Misconduct

1) David Oppenheimer

@Exhibit28 you read OHAG Prosecutor David Oppenheimer wrote to the 9th District court in CA-30398 that I “*admitted the commission investigated the matter*”; that is a direct outright lie. One can read the Exhibits enclosed to find the Ohio Supreme Court attachment ‘Series C’ showing each state agent, & agency, & judiciary, which I lawfully ‘Urged Objection’ that NO INVESTIGATION was ever done. I believe there’s case to be made that is a violation of criminal codes when the OHAG is deliberately lying to OBSTRUCT the FACT there was no investigation. I believe filing the intentional known lie is either Fraud or Falsification likely both. I then further allege the conspiracy by these 2 Ohio agencies to Obstruct the OCRC’s intentional denial of 1000’s of Ohioans rights yearly. To show Mr. Oppenheimer’s knowledge of his blatant lie, find Exhibit 29 which he filed to the same court that the commission unlawfully “Relied Upon” the other party making the accusation in a civil law matter; the world does not find acceptable excuse as relied upon by anyone to anything, certainly that shouldn’t be lawful. In fact, it shows the legislatively written to be NEUTRAL ARBITER of CIVIL law is biased.

2) Wayne Williams

The serious violation of rules by OHAG prosecutor Williams can be found by reading the attachment to the Ohio Supreme Court Memorandum, Exhibit 2, which directs to Series B attachments being read while using attachments in the B5 series as reference of William’s filed obstructions & more. (by reading B pages while looking over B5 pages you clearly find issues)

VIII. Prosecutor Oversees the Judge:

I showed you in exhibits 23 & 24 a former prosecutor for this very law was of being a founding member of “Team Prosecution” on the OHAG side; she then did oversee the Administrative law judge @ the very OCRC where she was rehired by the state of Ohio.

I believe I’ve shown enough detail for my complaint; I can detail the Administrative law Judge in trial.

IX. Unlawfully “Relied Upon” Former Commission staff Enrich themselves

In Exhibit 17 the 2nd pt showed the OCRC hired one DIANE CITRINO; Ms Citrino, in Exhibit 19 was an OCRC Regional Director during the building of set up & implementation of “Team Prosecution”. Once that team was set up, a nonprofit to enrich themselves needed to be set up behind the scenes for state agents to be the employers of ‘*Private Attorney Generals acting across the state*’, found in Exhibit 6, being “Relied Upon” Exhibit 29 described by OHAG Oppenheimer. Ms Citrino left the OCRC in late ‘07/’08 for the fertile grounds of fees assessed by her former colleagues.

All of what you’ve read in documents herein are what’s called Sham Legal Process. In Ohio there’s a Criminal Code for that, R.C.2921.52; the state agents are/ were all in their own self promulgated Sham Legal Process.

Statement of Claims

Claim #1:

Each & every named defendant took part in robbing me from 10years of my life to what it should have been by my own choices & acts. I clearly state these individuals denied me from my Statutory & Constitutional rights.

Claim #2:

These state of Ohio agents, acting under color of law stripped me of my Constitutional Right to Due Process; being my 14th amendment rights.

Claims #3

These state of Ohio agents, acting under color of law stripped me of my Constitutional Right to Equal Protection; being my 14th amendment rights.

Claims #4 - 56

I have listed 7 Ohio Criminal Codes in this paper. I intend to show that each named defendant had a part & committed violations of any or all of those statutes.

Relief

One could understand that I was forced into self defense to one continuous legal action from fall 2014 to now; that's 10 years in one case. My greatest relief would be to have my life restored from these 10yrs of unlawful persecution.

I have done so many law documents over 10yrs as pro se to all those places I just mentioned. The amount of time, researching, writing paperwork, filing, etc is a massive amount spent; one could possibly consider how many times for 10 yrs work at now 8 different appearances @ levels of judiciary, each time prejudiced to disregard, for what's in this document to you. Speaking of this document, I can tell you all facets done to this paper alone are now well over 100 hours spent.

I have literally pulled each state agents yearly wages, for the 10yrs off a govt public access reports; Commissioners \$58k a yr for 80hrs work total. Most state agent lawyers I've named went into 100k a yr. The admin agents, still there over 10 yrs went from 50k to where some are near 80k & others also went over 100k. I won't bore readers yet I'll inform you I calculated each person & took into account their role, accountability, overall responsibility to my persecution. I feel I've done a fair job to realistic accounting of comparison to damages etc to my life & career for the same 10yrs.

My list is as such:

Each Commissioner – \$500k
G. Michael Payton – \$2.5 million
Stephanie Demers - \$2.5 Million
Angela Phelps – 500k
Denise Johnson - \$1.5million
Desmon Martin - \$500k
Sandra Manis - \$200k

Tameka Brooks - \$200k
Vera Boggs - \$500k
Lori Anthony - \$1million

Wayne Williams – 750k
David Oppenheimer – 500k
Charles Miller – \$250k
Dave Yost – 1 (\$100 Silver certificate)

I desire to be freed of this life event, the anxiety & depression its caused, & all the other facets too lengthy to list. Of a forced career, I desire never being near HUD interfering in any free markets, long for time without doing legal work I never chose to be doing, & simply spend time with my dog doing what I may find to locating calm & happiness.

I pray an honorable court finally finds me worthy of fair & proper relief from all I've stood up to, mostly for the grander picture; of course there's some self interest. I believe I've earned that by enduring all I've shared when forced to be my own legal counsel.


Thank you for taking your time to read of my life's event. I appreciate you.

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July 2024, a copy of the foregoing was provided to the named defendants via certified mail, with signature return.

Stephanie Bostos Demers
7771 Cromwell End
NEW ALBANY OH 43054

Et al


Cary Hendy, Pro Se
/s Cary Hendy